



AIR TRANSPORT ASSOCIATION

October 22, 2004

Docket Management Facility,
U.S. Department of Transportation,
Attention: Docket No. FAA-2004-19451, Directorate Identifier 2002-NM-138-AD.
400 Seventh Street SW.,
Nassif Building, Room PL-401,
Washington, DC 20590.

Subject: A300 B2 and B4, A300-600, & A310 – Parking Brake Operated Valve – Comments on Proposed Rule

Ladies/Gentlemen:

FAA proposes to supersede an existing airworthiness directive (AD) that applies to all Airbus A300 B2 and B4 series airplanes; certain A300 B4-600, B4-600R, C4-605R Variant F, and F4-600R series airplanes; and A310 series airplanes. The existing AD currently requires identification of the part number and serial number of the parking brake operated valve (PBOV); and, if necessary, inspections of the PBOV, including a functional check of the PBOV, and follow-on and corrective actions. The existing AD also provides for optional terminating action for the requirements of that AD. This proposed AD would require modification of all affected PBOVs, or replacement with new, non-affected PBOVs, which would terminate the requirements of the existing AD. ATA appreciates the opportunity to comment on this proposed rule.

Our members generally support the intent of the rulemaking; however, additional review and clarification would be desirable on the attached comment. Specifically:

- Service Bulletin – The referenced Service bulletin SB A300-32AO441 meets the intent of the AD. Therefore, is there need to create an AD for this item.

Your serious consideration of this observation and comment would be greatly appreciated.

Sincerely,

Robert Peel
Director of Quality
Air Transport Association

Attachments

Peel, Robert

From: Joe Spielman [joe.spielmann@astaraircargo.us]
Sent: Thursday, October 28, 2004 5:23 PM
To: rpeel@airlines.org
Subject: RE: ATA Memo 04-AD-402: re. A300 and A310 - Parking Brake Operated Valve - Proposed Rule

Robert, ASTAR has reviewed this NPRM and presently is in compliance SB A300-32A0441. ASTAR believes this Service bulletin acquaintly meets the intent of the AD. Therefore, there is no need to create an AD for this item.

Regard, Joe Spielmann, Sr. Manager QA/QC, Chief Inspector. ASTAR Air Cargo

-----Original Message-----

From: rpeel@airlines.org [mailto:rpeel@airlines.org]
Sent: Wednesday, October 27, 2004 12:36 PM
To: Joe Spielman
Subject: ATA Memo 04-AD-402: re. A300 and A310 - Parking Brake Operated Valve - Proposed Rule

ATA Memo 04-AD-402: re. A300 B2 and B4, A300-600, & A310 - Parking Brake Operated Valve - Proposed Rule

To A300 & A310 Operators

FAA proposes a new AD that requires modification of all affected parking brake operated valve [PBOVs], or replacement with new, nonaffected PBOVs, which would terminate the requirements of an original existing AD

Provide comments to ATA by November 16, 2004.

For additional information, please see ATA Memorandum 04-AD-402 at:
<http://www.airlines.org/restricted/ad/d.aspx?nid=8358>

Regards

Robert Peel
Director of Quality
Air Transport Association
1301 Pennsylvania Avenue, NW Suite 1100
Washington, DC 20004-1707
Phone: 1 202 626 4125
Fax: 1 202 626 7282
www.airlines.org
rpeel@airlines.org